

IN THE DRAWINGS

The attached sheets of drawings include changes to figures 2, 5A and 5B. Amended figure 2 is labeled identify main memory 133. Amended figure 5A is labeled to identify GUI panel 530. Amended figure 5B has been labeled to identify GUI panel 532.

Attachments: Replacement Sheets
 Annotated Sheets Showing Changes

REMARKS

This is intended as a full and complete response to the Office Action dated July 17, 2006, having a shortened statutory period for response set to expire on October 12, 2006. Please reconsider the claims pending in the application for reasons discussed below.

In the specification, the paragraphs [0001], [0006], [0034], [0042], [0043], [0046], [0052], [0055], [0057] and [0066] have been amended to correct minor editorial problems.

Claims 1-20 are pending in the application. Claim 5 has been canceled. Claims 1-4 and 6-20 remain pending following entry of this response. Claims 1, 6-7, 11 and 18 have been amended. Applicants submit that the amendments and new claims do not introduce new matter.

Specification Objections

Applicants are required to update the status (pending, allowed, etc.) of all parent priority applications in the first line of the specification. The status of all citations of U.S. filed applications in the specification should also be updated where appropriate.

Applicants respectfully submit that the status of all parent priority applications and citations of U.S. filed applications have been updated and respectfully request withdrawal of this rejection.

Drawings

Amended figure 2 is labeled identify main memory 133. Amended figure 5A is labeled to identify GUI panel 530. Amended figure 5B has been labeled to identify GUI panel 532.

Claim Rejections - 35 U.S.C. § 112

Claims 8 and 9 are rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the enablement requirement.

"The test of enablement is whether one reasonably skilled in the art could make or use the invention from the disclosures in the patent coupled with information known in the art without undue experimentation." *United States v. Telectronics, Inc.*, 857 F.2d 778, 785, 8 USPQ2d 1217, 1223 (Fed. Cir. 1988). A patent need not teach, and preferably omits, what is well known in the art. *In re Buchner*, 929 F.3d 660, 661, 18 USPQ2d 1331, 1332 (Fed. Cir. 1986), *cert. denied*, 480 U.S. 947 (1987).

Applicants respectfully submit that the current application discloses that "embodiments of the present invention allow an annotation structure to be associated with data objects of the same type, data objects of different types, data objects from a common data source, or data objects from different data sources (*i.e.*, disparate data objects). (Paragraph 26). Data points of differing types are disclosed and examples such as database tables, rows, columns, cells, or groups of cells and selected portions of a text document are given. (Paragraph 52). Additionally, figures 4A-4C and 5A-5B also provide enablement for data points of differing types, retrieving, from a configuration file, at least one annotation structure associated with a set of data points of the same differing types.

Therefore, the claims 8 and 9 are believed to be allowable, and allowance respectfully requested.

Claims 14-16 and 19 are also rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the enablement requirement.

Applicants respectfully submit that specification discloses "the term point may generally refer to any identifiable data unit (or group of data units) capable of being annotated." (Paragraph 52). Additionally Applicants submit that figure 4C depicts a data point comprising a plurality of data points. Since the limitations cited by the Examiner

are in fact disclosed in the specification, claims 14-16 and 19 are believed to be allowable, and allowance is respectfully requested.

Claim Rejections - 35 U.S.C. § 102

Claims 1-6 and 11-20 are rejected under 35 U.S.C. 102(b) as being clearly anticipated by *Gupta et al.* (U.S. Patent 6,956,593, hereinafter, "*Gupta*"). Applicants respectfully traverse this rejection.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

In this case, *Gupta* does not disclose "each and every element as set forth in the claim." For example, *Gupta* does not teach, show or suggest retrieving, from a configuration file, information identifying at least one annotation structure associated with the at least one data object based, at least in part, on the set of identifying parameters and a role of the user, the annotation structure defining one or more annotation fields into which the annotation will be entered, as recited in independent claims 1, 11 and 18.

As described in section [0026], when a user selects a set of one or more data objects for annotation, the configuration file may be accessed to determine a proper annotation structure for use in generating an annotation form, based on the selected data objects and a role of the user.

In this regard, it is noted that the Examiner rejects claim 5 (now canceled), which recites that "wherein retrieving the information identifying at least one annotation structure associated with the at least one data object is based, at least in part, on a role

of the user." For support of this rejection the Examiner cites column 13, lines 1-10, column 15, line 66 through column 16, line 14 and Figure 3, element 10, referring to identifying which users are able to read and/or write to an annotation set. Applicants respectfully submit, however, that the Examiner's characterization of *Gupta* is incorrect. An annotation set is a collection of existing annotations. (column 9, line 15-25). *Gupta* distinguishes the creation of an annotation from the grouping of annotations into sets. (column 9, lines 1-25). *Gupta* also distinguishes the creator of a set of annotations from the creator of an individual annotation. (column 16, line 1-30.) Thus, contrary to the Examiner's assertion, *Gupta* does not disclose retrieving an annotation structure defining fields into which annotation data will be entered, based, at least in part, on the role of the user, as claimed.

Therefore, Applicants respectfully submit that independent claims 1, 11 and 18 as well as their dependents, are allowable and respectfully request withdrawal of this rejection.

Claim Rejections - 35 U.S.C. § 103

Claims 7-10 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Gupta*. Applicants respectfully traverse this rejection.

The Examiner bears the initial burden of establishing a *prima facie* case of obviousness. See MPEP § 2142. To establish a *prima facie* case of obviousness three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one ordinary skill in the art, to modify the reference or to combine the reference teachings. Second, there must be a reasonable expectation of success. Third, the prior art reference (or references when combined) must teach or suggest all the claim limitations. See MPEP § 2143.

The present rejection fails to establish at least the third criteria. For example, with respect to independent claim 7, *Gupta* does not disclose receiving a request from a

user to create an annotation for a specified set of disparate data points from different data sources, determining if the disparate data points are of the same type, if so, retrieving, from a configuration file, at least one annotation structure associated with the same type as the data points; and generating, based on the annotation structure, an interface for entering annotation information to be associated with the specified set of data points.

The Examiner cites *Gupta* Column 7, line 40 through Column 8, line 19 as teaching a variety of data points available to the user to select data for annotation, including time line beginning and end and audio and video signal tracking. Applicants respectfully submit that *Gupta* does not disclose data points from different sources, as recited in the claims. In contrast *Gupta* discloses a single source, saying that even if multiple different streams are identified, they are only different versions of the same media content. (Column 9, line 28-32).

Further, Applicants also respectfully submit that *Gupta* does not disclose, and the Examiner has made no reference to, generating, based on the annotation structure, an interface for entering annotation information to be associated with the specified set of data points. In contrast, *Gupta* discloses a user interface (figure 3, 152) that is displayed before a user selects data to annotate and the user interface for entering annotation information receives a user request to add an annotation.

Therefore, Applicants respectfully submit that independent claim 7, as well as its dependents, are allowable and respectfully request withdrawal of this rejection.

Conclusion

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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ANNOTATED SHEET SHOWING CHANGES

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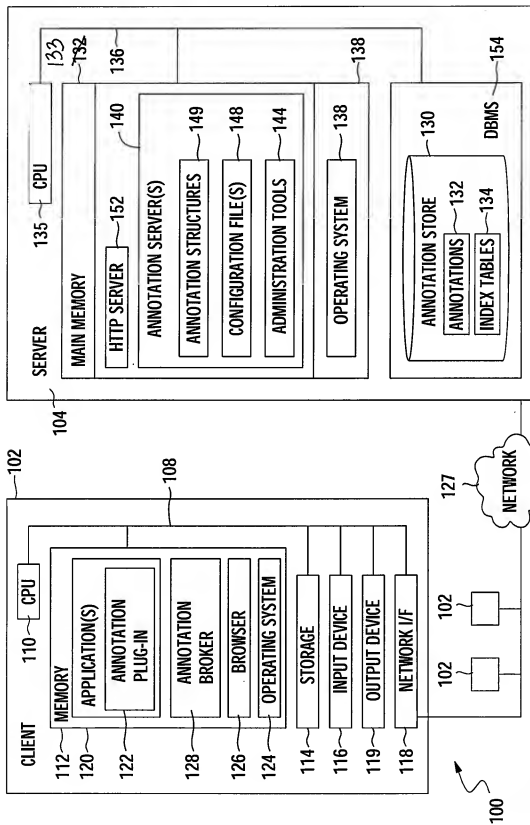


FIG. 2

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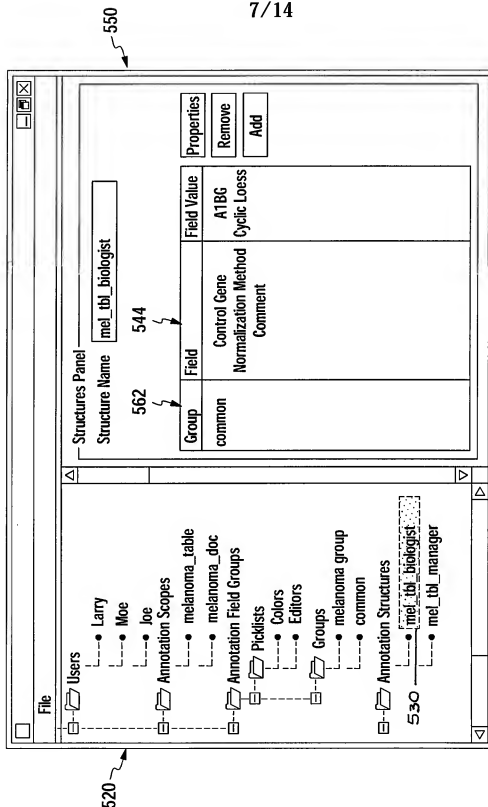


FIG. 5A

ROC920030193US1

ANNOTATED SHEET SHOWING CHANGES

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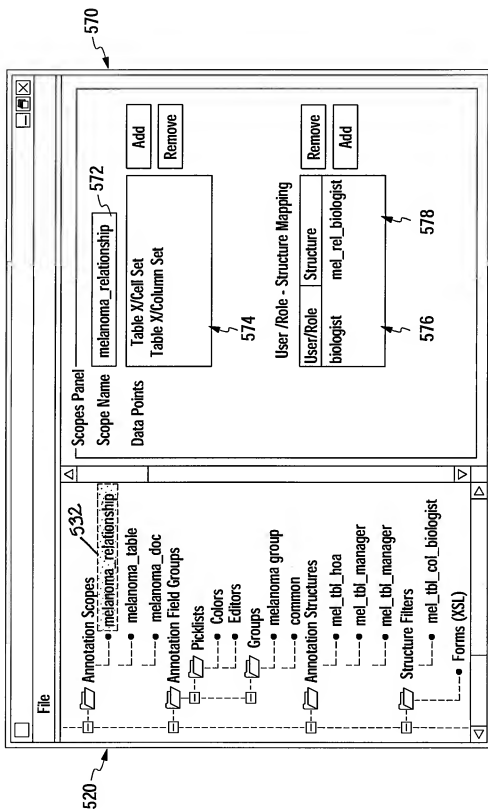


FIG. 5B